1			
2			
3			
4			
5			
6	I D HEED CE A TEC DI	OTRICE COLUET	
7	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
8			
9	TAFT CHARLES, on behalf of himself and all others similarly situated,	No. 2:25-CV-01361-KKE	
10	Plaintiff,	STIPULATED MOTION TO EXTEND DEADLINES AND ORDER	
11	V.	DEMBERINGS AND GREEK	
12	CHIME FINANCIAL, INC.,		
13			
- 1	L Detendant.		
14	Defendant.		
14 15		Defendant Chime Financial, Inc. ("Chime")	
		,	
15	Plaintiff Taft Charles ("Plaintiff") and I	dersigned counsel, hereby stipulate and request	
15 16	Plaintiff Taft Charles ("Plaintiff") and I (collectively, the "Parties"), by and through their un	dersigned counsel, hereby stipulate and request respond to the Complaint and (2) the recently-	
15 16 17 18	Plaintiff Taft Charles ("Plaintiff") and I (collectively, the "Parties"), by and through their un that the Court extend (1) the deadline for Chime to	dersigned counsel, hereby stipulate and request respond to the Complaint and (2) the recently-	
15 16 17	Plaintiff Taft Charles ("Plaintiff") and I (collectively, the "Parties"), by and through their un that the Court extend (1) the deadline for Chime to issued initial case deadlines. In support of the for follows:	dersigned counsel, hereby stipulate and request respond to the Complaint and (2) the recently-	
15 16 17 18 19	Plaintiff Taft Charles ("Plaintiff") and I (collectively, the "Parties"), by and through their un that the Court extend (1) the deadline for Chime to issued initial case deadlines. In support of the for follows:	dersigned counsel, hereby stipulate and request respond to the Complaint and (2) the recently-regoing request for relief, the Parties state as Superior Court for the State of Washington in	
15 16 17 18	Plaintiff Taft Charles ("Plaintiff") and I (collectively, the "Parties"), by and through their un that the Court extend (1) the deadline for Chime to issued initial case deadlines. In support of the follows: 1. Plaintiff filed his Complaint in the and for King County on June 17, 2025. See Dkt. 1-	dersigned counsel, hereby stipulate and request respond to the Complaint and (2) the recently-regoing request for relief, the Parties state as Superior Court for the State of Washington in	
115 116 117 118 119 220	Plaintiff Taft Charles ("Plaintiff") and I (collectively, the "Parties"), by and through their un that the Court extend (1) the deadline for Chime to issued initial case deadlines. In support of the follows: 1. Plaintiff filed his Complaint in the and for King County on June 17, 2025. See Dkt. 1-	dersigned counsel, hereby stipulate and request respond to the Complaint and (2) the recently-regoing request for relief, the Parties state as Superior Court for the State of Washington in 3. to this Court on July 18, 2025. Dkt 1. Pursuant	
115 116 117 118 119 120 221 221	Plaintiff Taft Charles ("Plaintiff") and I (collectively, the "Parties"), by and through their un that the Court extend (1) the deadline for Chime to issued initial case deadlines. In support of the for follows: 1. Plaintiff filed his Complaint in the and for King County on June 17, 2025. See Dkt. 1- 2. Chime timely removed this action to Fed. R. Civ. P. 81(c)(2)(C), Chime's responsive	dersigned counsel, hereby stipulate and request respond to the Complaint and (2) the recently-regoing request for relief, the Parties state as Superior Court for the State of Washington in 3. to this Court on July 18, 2025. Dkt 1. Pursuant	
15 16 17 18 19 20 21 22 22	Plaintiff Taft Charles ("Plaintiff") and I (collectively, the "Parties"), by and through their un that the Court extend (1) the deadline for Chime to issued initial case deadlines. In support of the for follows: 1. Plaintiff filed his Complaint in the and for King County on June 17, 2025. See Dkt. 1- 2. Chime timely removed this action to Fed. R. Civ. P. 81(c)(2)(C), Chime's responsive	dersigned counsel, hereby stipulate and request respond to the Complaint and (2) the recently-regoing request for relief, the Parties state as Superior Court for the State of Washington in 3. to this Court on July 18, 2025. Dkt 1. Pursuant pleading is due on July 25, 2025. S Order Regarding Initial Disclosures and Joint	
15 16 17 18 19 20 21 22 23 24	Plaintiff Taft Charles ("Plaintiff") and I (collectively, the "Parties"), by and through their un that the Court extend (1) the deadline for Chime to issued initial case deadlines. In support of the for follows: 1. Plaintiff filed his Complaint in the and for King County on June 17, 2025. See Dkt. 1- 2. Chime timely removed this action to Fed. R. Civ. P. 81(c)(2)(C), Chime's responsive 3. On July 21, 2025, the Court issued it	dersigned counsel, hereby stipulate and request respond to the Complaint and (2) the recently-regoing request for relief, the Parties state as Superior Court for the State of Washington in 3. to this Court on July 18, 2025. Dkt 1. Pursuant pleading is due on July 25, 2025. S Order Regarding Initial Disclosures and Joint	

26(f), serve Initial Disclosures, and file a Joint Status Report and Discovery Plan for August 11, August 25, and September 2, 2025, respectively. Dkt 10.

- 4. Good cause supports the requested extensions. The additional time will enable counsel for Chime, who were recently retained, to investigate and respond to Plaintiff's allegations and to prepare for and engage in the Rule 26(f) conference, serve initial disclosures, and negotiate and file the joint status report. The requested extensions also account for the Labor Day holiday and other pre-planned travel and vacation schedules. Further, this action is still in its early stages and the Parties do not expect these brief extensions to meaningfully affect the overall case schedule.
- 5. Accordingly, the Parties stipulate and respectfully move the Court to enter an order extending the deadlines in this action as follows:

Event	Current Deadline	New Deadline
Deadline for Chime to respond to the Complaint	July 25, 2025	September 18, 2025
Deadline for Federal Rule of Civil Procedure ("FRCP") 26(f) Conference	August 11, 2025	September 8, 2025
Initial Disclosures Pursuant to FRCP 26(a)(1)	August 25, 2025	September 22, 2025
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f)	September 2, 2025	October 6, 2025

1	Dated: July 23, 2025	By: s/Susan D. Fahringer
2		Susan D. Fahringer, Bar No. 21567 Erin K. Earl, Bar No. 49341
3		Perkins Coie LLP
4		1301 Second Avenue, Suite 4200 Seattle, Washington 98101-3804
5		Telephone: +1.206.359.8000 Facsimile: +1.206.359.9000
6		EEarl@perkinscoie.com SFahringer@perkinscoie.com
7		Attorneys for Defendant Chime Financial,
8		Inc.
9		s/ Jason T. Dennett Jason T. Dennett, WSBA No. 30686
10		Kaleigh N. Boyd, WSBA No. 52684
11		Tousley Brain Stephens PLLC 1200 Fifth Avenue, Suite 1700
12		Seattle, Washington 98101-3147 Telephone: +1.206.682.5600
13		Facsimile: +1.206.682.2992 jdennett@tousley.com
14		kboyd@tousley.com
15		Wade Kilpela Slade LLP
16		Edwin J. Kilpela, Jr. 6425 Living Place, Suite 200
17		Pittsburg, PA 15206 Telephone: +1.412.314.0515
18		ek@waykayslay.com
19		North Law PLLC
20		Evan E. North 1900 Market Street, Suite 800
21		Philadelphia, PA 19103 Telephone: +1.202.921.1651
22		evan@northlawpllc.com Attorneys for Plaintiff
23		Auorneys jor 1 iainiijj
24		
25		
26		

1		<u>ORDER</u>
2	IT IS SO ORDERED.	
3		
4	DATED 41: 2441 1 CL 1 2025	
5	DATED this 24th day of July, 2025	
6		
7		Hymberly X Eanson
8		THE HONORABLE KYMBERLY K. EVANSON
9		UNITED STATES DISTRICT JUDGE
10		
11		
12		
13		
14		
15		
16		
17 18		
19		
20		
21		
22		
23		
24		
25		
26		

[PROPOSED] ORDER (No. 2:25-CV-01361-KKE) Perkins Coie LLP 1301 Second Avenue, Suite 4200 Seattle, WA 98101-3804 Phone: +1.206.359.8000 Fax: +1.206.359.9000